

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

<p>Myriam Parada,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>Anoka County; Anoka County Sheriff James Stuart; Coon Rapids Police Officer Nikolas Oman; City of Coon Rapids; unknown/unnamed defendants John Doe & Jane Doe; All individuals being sued in their individual and official capacity.</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No: 18-cv-795 (JRT/TNL)</p> <p style="text-align: center;">PLAINTIFF’S MOTION FOR ATTORNEY’S FEES AND NONTAXABLE COSTS</p>
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Pursuant to Rule 54(d)(2) of the Federal Rules of Civil Procedure, and D. Minn. Local Rule 54.3(b), Plaintiff Myriam Parada moves the District Court for the following relief:

1. A finding that Plaintiff Myriam Parada was the prevailing party in the underlying action.
2. An award of attorney’s fees and nontaxable costs pursuant to 42 U.S.C. §1988, which provides that in any action to enforce the provisions of 42 U.S.C. §1983 the court may award the prevailing party their reasonable attorney’s fees and costs.
3. A finding and order that Plaintiff Myriam Parada is entitled to approximately \$350,000.00 in attorney’s fees in connection with the prosecution of this action, which will be established precisely with affidavits and itemized billing records submitted with

Plaintiff's brief pursuant to D. Minn. Local Rule 54.3(b). Plaintiff will also establish the reasonableness of the rates used to obtain the amount via affidavits.

4. An award of approximately \$5,500.60 in non-taxable costs incurred in prosecuting this action, which will be established precisely with affidavits and itemized billing records submitted with Plaintiff's brief pursuant to D. Minn. Local Rule 54.3(b).

In support of their Motion, the Plaintiffs rely upon the Judgment entered on February 2, 2021 and any orders amending said judgment, the brief which she will submit in accordance with the District Court's briefing schedule under D. Minn. Local Rule 54.3(b), all affidavits and exhibits submitted with that brief, the applicable law, the transcript, the record, and the entire case file.

Respectfully submitted,

KUTAK ROCK LLP

Date: February 16, 2021.

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